

Kevin H. Marino
John D. Tortorella
Wan Cha
MARINO, TORTORELLA & BOYLE, P.C.
437 Southern Boulevard
Chatham, New Jersey 07928-1488
Tel: (973) 824-9300
Fax: (973) 824-8425
Counsel for Defendant Gene Levoff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

-----	x	
UNITED STATES OF AMERICA,	:	
	:	No. 19-cr-780 (WJM)
	:	
v.	:	Return Date: To Be Scheduled
	:	
	:	Document Electronically Filed
	:	
GENE LEVOFF,	:	<u>Oral Argument Requested</u>
	:	
Defendant.	:	
-----	x	

TO: Courtney A. Howard, A.U.S.A.
Daniel V. Shapiro, A.U.S.A.
OFFICE OF THE U.S. ATTORNEY
970 Broad Street
Suite 700
Newark, New Jersey 07102

PLEASE TAKE NOTICE that on a date determined by the Court, Defendant Gene Levoff ("Defendant"), through his attorneys, Marino, Tortorella & Boyle, P.C. (Kevin H. Marino, Esq., appearing), will move before the Honorable William J. Martini, U.S.D.J., United States District Court for the District of New Jersey, Martin Luther King, Jr., Federal Building & Courthouse, Courtroom 4B, 50 Walnut Street, Newark, New Jersey 07102, for entry of an Order dismissing the Indictment with prejudice for failure to state a crime.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Defendant will rely

on the Memorandum of Law submitted herewith. A proposed form of Order is also submitted herewith.


PLEASE TAKE FURTHER NOTICE that Defendants respectfully request oral argument on this motion.

Dated: April 27, 2020

Respectfully submitted,

MARINO, TORTORELLA & BOYLE, P.C.
Attorneys for Defendant Gene Levoff

By:

A handwritten signature in black ink, appearing to read 'Kevin H. Marino', is written over a horizontal line.

KEVIN H. MARINO